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Defendants AEROFLEX INCORPORATED,
AEROFLEX COLORADO SPRINGS, INC.,
AMI SEMICONDUCTOR, INC., MATROX
ELECTRONIC SYSTEMS, LTD., MATROX
GRAPHICS INC., MATROX
INTERNATIONAL CORP., and MATROX
TECH, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,

Case No. C03-4669 MJJ (EMC)

Plaintiff,

Case No. C03-2289 MJJ (EMC)

vs.

**PLAINTIFF SYNOPSY AND CUSTOMER
DEFENDANTS' NOTICE OF ERRATA TO
MOTIONS FOR SUMMARY JUDGMENT
FILED WITH THE COURT ON AUGUST
18, 2006**

AEROFLEX INCORPORATED, AMI SEMICONDUCTOR, INC., MATROX ELECTRONIC SYSTEMS LTD., MATROX GRAPHICS INC., MATROX INTERNATIONAL CORP., MATROX TECH INC., AND AEROFLEX COLORADO SPRINGS, INC..

Defendants.

SYNOPSYS, INC.

Plaintiff.

vs.

RICOH COMPANY, LTD.,

Defendant.

1 Plaintiff Synopsys, Inc. and Defendants Aeroflex Incorporated, Aeroflex Colorado Springs,
 2 Inc., AMI Semiconductor, Inc., Matrox Electronic Systems Ltd., Matrox Graphics Inc., Matrox
 3 International Corp., and Matrox Tech, Inc. (collectively, "Synopsys and the Customer Defendants")
 4 submit this Errata to the Motions for Summary Judgment, filed August 18, 2006.

5 **Errata re Notice of Motion and Motion for Summary Judgment of Non-Infringement (RTL)**

6 **[Summary Judgment Motion No. 1]**

7 At page 3, line 19, second column, the text currently reads: "Ex. 9 at 12:9-12." The correct
 8 text should read: "Ex. 8 at 12:9-12."

9 At page 3, line 23, second column, the text currently reads: "Ex. 9 at 12:5-7." The correct text
 10 should read: "Ex. 8 at 12:5-7."

11 At page 7, lines 23-24, the text currently reads: "Shir-Shen Chang Dep. At 54:1-3." The
 12 correct text should read: "Ex. 89 (Shir-Shen Chang) at 54:1-3."

13 At page 7, line 25, the text currently reads: Karen Pieper Dep. At 14:22-23." The correct text
 14 should read: "Ex. 90 (Karen Pieper) at 14:22-23."

15 **Errata re Notice of Motion and Motion for Summary Judgment of Non-Infringement (Hardware)**

16 **Cells [Summary Judgment Motion No. 2]**

17 At page 10, line 10, the text currently reads: "Soderman Rebuttal Report at 8." The correct
 18 text should read: "Ex. 91 at 8."

19 At page 16, line 2, the text currently reads: "[432 patent, col. 16:14-17:10]." The text should
 20 read: "Ex. 1 at col. 16:14-17:10."

21 **Errata re Notice of Motion and Motion for Summary Judgment of Invalidity of U.S. Patent No.**
 22 **4,922,432 For Violation of 35 U.S.C. § 102(f), Or, In the Alternative, To Dismiss For Failure to**

23 **Join All Co-Owners as Plaintiffs [Dispositive Motion No. 3]**

24 At page 2, line 17, the text currently reads: "[Foo 5:25-6:25]." The corrected text should read
 25 "Ex. 23 (Foo) at 5:25-6:25."

26 At page 3, line 16, the text currently reads: "[Foo Ex. 521; SC3406 (confirming Dr. Foo's
 27 enrollment in the class).]" The corrected text should read: "Ex. 26; Ex. 25 (confirming Dr. Foo's
 28 enrollment in the class)."

1 At page 7, between lines 17 and 18, the text currently reads: “432 patent at 9:24-34.” The
 2 corrected text should read: “Ex. 1 at 9:24-34.”

3 At page 8, line 11, the text currently reads: “[Foo Ex. 521.]” The corrected text should read:
 4 “Ex. 26.”

5 **Errata re Notice of Motion and Motion for Summary Judgment of Invalidity of Claims 13-17 of**
 6 **U.S. Patent No. 4,922,432 [Dispositive Motion No. 4]**

7 At page 5, line 28, the text currently reads: “[1st Reexam Request.]” The corrected text should
 8 read: “Ex. 38.”

9 At page 8, fn. 5, the text currently reads: “Claim Construction Order at 10.” The corrected text
 10 should read: “Ex. 8 at 20.”

11 **Errata re Notice of Motion and Motion for Summary Judgment of Unenforceability Due to**
 12 **Inequitable Conduct [Summary Judgment Motion No. 5]**

13 At page 8, line 18, the text currently reads: “Ex. 40 at RCL000228.” The corrected text should
 14 read: “Ex. 46 at RCL000228.”

15 At page 9, line 17, the text currently reads: “*Id.* at RCL000197.” The corrected text should
 16 read: “Ex. 48 at RCL000197.”

17 **Errata re Defendants’ Motion for Summary Judgment Regarding the Scope of Patent Damages**
 18 **for Alleged Infringement of U.S. Patent No. 4,922,432 [Summary Judgment Motion No. 7]**

19 At page 4, line 16, the text currently reads: “*See* Olson Decl., ¶ 7.” The corrected text should
 20 read: “*See* Ex. 58 at ¶ 7.”

21 At page 4, lines 18-19, the text currently reads: “(‘Heynes Decl.’), ¶ 4”. The corrected text
 22 should read: “Ex. 59 at ¶ 4”.

23 At page 4, line 21, the text currently reads: “*See* Heynes Decl., ¶¶ 5 and 6.” The corrected text
 24 should read: “*See* Ex. 59 at ¶¶ 5 and 6.”

25 At page 4, line 22, the text currently reads: “*See* Heynes Decl., ¶¶ 12-14.” The corrected text
 26 should read: “Ex. 59 at ¶¶ 12-14.”

1 **Errata re Notice of Motion and Motion for Summary Judgment of Non-Willfulness [Summary**

2 **Judgment No. 9]**

3 At page 1, lines 16 and 17, the text currently reads, "See Amended Complaint at ¶¶ 20, 26, 32,
4 28, 44, 50, and 56." The corrected text should read: "See Ex. 82 at ¶¶ 20, 26, 32, 28, 44, 50, and 56."

5 Dated: August 21, 2006

Respectfully submitted,

6 HOWREY LLP

7
8 By: /s/Denise M. De Mory
9 Denise M. De Mory
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11 SYNOPSYS, INC. and for Defendants
12 AEROFLEX INCORPORATED,
13 AEROFLEX COLORADO SPRINGS,
14 INC., AMI SEMICONDUCTOR, INC.,
15 MATROX ELECTRONIC SYSTEMS,
16 LTD., MATROX GRAPHICS, INC.,
17 MATROX INTERNATIONAL CORP.,
18 and MATROX TECH, INC.